## **BDCP EIR/EIS Review Document Comment Form**

Document: Administrative Draft

Comment Source: USACE, Sacramento District, Operations

Submittal Date: April 16, 2012

No.	Page	Line #	Comment	ICF Response
1	6-31	24-26	Nonproject (nonfederal) and Project	
			(Federal) levees are both typically	
			operated and maintained by local	
			maintaining agencies. Project levees may	
			have a larger regional entity that serves as	
			the sponsor, such as the Central Valley	
			Flood Protection Board.	
2	6-31	30-31	"Very few levees in the central Delta meet these	
	0 31	30 31	standards or pass the initial inspections." Not sure if this is true?	
3	6-31	27-43	The "certain requirements" mentioned in line 28 is the "delta specific standard" in line 39. The "PL 84-	
			99 standard" – and subsequent Delta standard	
			applies to non-project levees. If the non-project levees meet the PL 84-99 standard, they become	
			non-Federal levees eligible for assistance under	
			RIP. The standard for all federal project levees is	
			the as-built/O&M manual condition. Suggest	
			deleting sentence 37-39. It is confusing and has no	
			value-added.	
4	6-1	29	Largest river based on what metric? It has a smaller watershed than the San Joaquin.	
5	6-4	10	Typo – Insert "to" after "River"	
6	6-6	39	Suggest noting the typical tidal range in feet.	
7	6-7	18	confusing sentence	
8	6-12	2	suspect that the river is perched with natural	
			levees, rather than the ground on either side	
9	6-42	38	having subsided.  Disagree. A representative flood hydrograph	
	0 42	30	could be used, rather than actual hourly data.	
			The effects of alternatives could be evaluated	
			by modifying the representative hydrograph	
			and using a hydraulic model to determine flood	
10	6.43	42	impacts.	
10	6-42	42	This seems pretty simplistic to use as a metric	
			for impacts to flooding, which can be affected by storage levels across multiple reservoirs as	
			well as local unregulated inflows.	
11	6-43	8	Shouldn't the No Action alternative also	
			account for climate change? This alt should	
			represent what the future would be with no	

			action, and climate change is a component of the future. Or in more general terms, shouldn't all of the alternatives assume the same hydrologic condition? Otherwise it will be unclear whether the differences between alternatives is due to the alternatives themselves, or due to the differing assumptions about climate.	
12	6-44	4	Is this considered an adverse effect if it occurs in any one reservoir, or if it occurs in all reservoirs?	
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
32				
33				
34				
35				
36				
37				
38				
39				
40		1		